

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,  
Plaintiff,  
v.**

**KEVIN A. THOBIAZ  
Defendant.**

**CRIMINAL NO.25-303(CVR)**

**Informative Motion and Requesting Order**

**TO THE HONORABLE COURT:**

The United States of America by and through the undersigned attorneys, very respectfully states and prays as follows:

1. The United States submits that as of today it has provided two Rule 16 discovery packages to counsel for defendant.
2. The United States is seeking additional time to produce Rule 16 discovery, that is, on or before August 7, 2025. As such, the United States also requests that motion practice deadlines be determined at the status conference to be held in this case, and that any current deadlines, such as the 14-day deadline at ECF No. 11, be vacated.

**WHEREFORE**, the United States of America respectfully requests that this Honorable Court **GRANT** this motion for extension of time and to set deadlines at the Status Conference scheduled in the present case.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, this 23<sup>rd</sup> day of July 2025.

W. STEPHEN MULDROW  
United States Attorney

s/Myriam Y. Fernandez-Gonzalez  
Myriam Y. Fernandez-Gonzalez  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that; I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, this 23<sup>rd</sup> day of July 2025.

s/Myriam Y. Fernandez-Gonzalez  
Myriam Y. Fernandez-Gonzalez  
Assistant United States Attorney